ChildProtectionPeak

Queensland Aboriginal and Torres Strait Islander Child Protection Peak Limited

Submission: Review of Family and Child Commission Act

March 2023

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Who we are

The Queensland Aboriginal and Torres Strait Islander Child Protection Peak (QATSICPP) welcomes the opportunity to provide input into the review of the *Family and Child Commission Act (2014)* (the 'Act') on behalf of our members.

Our membership includes 35 Aboriginal and Torres Strait Islander Community-Controlled Organisations across Queensland. At the community level, our members provide services, advice and support relating to the safety and wellbeing of Aboriginal and Torres Strait Islander children, young people and families.

Our members are committed to our overarching purpose and vision that all Aboriginal and Torres Strait Islander children and young people are physically, emotionally and spiritually strong; live in safe, caring and nurturing environments within their own families and communities; and are afforded the same life opportunities available to other children and young people to achieve their full potential, This includes access to culturally safe and secure service provision.

Our responses to Family and Child Commission Act review

QATSICPP welcomes the opportunity to provide input into the review of the Act and believe that the review should not be narrowed to the existing roles and functions of the QFCC. The consultation paper released by the Department of Justice and Attorney General (DJAG) accompanying the review doesn't explicitly provide the rationale as to its limitations.

QATSICPP's view is that legislative reviews are an opportunity to not only examine how a law has been operating but are also an opportunity to consider future needs, account for them and consider how legislation can support and enable Queensland to meet its state (including the *Queensland Human Rights* Act, which came into effect after the *Family and Child Commission Act 2014* (Qld) was introduced), national and international commitments. Consequently, this submission calls for a full consideration of what changes are needed to the Act to ensure it meets its objectives.

Please see our response to the terms of reference for the review below:

Whether the Act is meeting its objectives

QATSICPP notes that there is limited reference to Aboriginal and Torres Strait Islander peoples in the current Act. Other than aspects of the Act which require Aboriginal and Torres Strait Islander persons to be in certain roles, there are only two references providing detail as to the focus of Queensland Family and Child Commission as it relates to First Nations peoples:

Section 23 (1)

(b) ensure the interests of Aboriginal people and Torres Strait Islanders are adequately and appropriately represented;

(c) respect and promote the role of Aboriginal and Torres Strait Islander service providers in supporting Aboriginal and Torres Strait Islander families and communities to protect and care for their children and young people;

Section 40

(1) The commission must include in its annual report for a financial year—

(iii) Queensland's progress in reducing the number of, and improving the outcomes for, Aboriginal and Torres Strait Islander children and young people in the child protection system;

Given the Queensland Child Protection Commission of Inquiry's (QCPCI) numerous recommendations outlining the transformative change needed to reduce the over-representation of Aboriginal and Torres Strait Islander children and people in care, QATSICPP questions whether there is sufficient focus for the QFCC on providing oversight and enacting reform on this critical issue.

QATSICPP is also concerned that, given the complexity of issues impacting on First Nations families and communities around Queensland, and the disproportionate (and often harmful) impact the child protection system has on these families[1], the Act does not enshrine a dedicated Aboriginal and Torres Strait Commissioner role with equal power to that of the Principal Commissioner.

The ACIL Allen *'Independent Review of the performance of Queensland Family and Child Commission of its functions'* (The Independent Review) report made some findings relevant to our concerns. These include:

- The relatively few systemic reviews and oversight activities the QFCC has undertaken addressing the overrepresentation of Aboriginal and Torres Strait Islander child and young people in the child protection system.
- Suggesting the appointment of joint Principal Commissioners, one who is an Aboriginal and Torres Strait Islander person.
- Highlighting a need for the QFCC to collaborate more closely with organisations that work specifically with Aboriginal and Torres Strait Islander people to ensure First Nations communities are well engaged and the principle of self determination is upheld.[2]

QATSICPP also notes the ACIL Allen review identified stakeholder feedback about the inability of the QFCC to table reports in Parliament, which limits the visibility and potential impact of the QFCC's work. QATSICPP supports this assessment and is also concerned that the Act in its current form does not give the QFCC any powers to hold public inquiries into matters within its remit.

Whether amendments to the Act are required to ensure it better meets its objects

As noted by the ACIL Allen *Independent Review*, with the impetus from the QCPCI now waning, the QFCC is at a crossroads. Progress has been made with regards to a number of key reform areas identified by the QFCC, however the overrepresentation of Aboriginal and Torres Strait Islander children and young people in out-of-home care (and the subsequent disconnection and further entrenchment of disadvantage for our communities) has not reduced.

[1] Family Matters report, Carmody Inquiry report
[2] ACIL Allen, 2022

If Queensland is to meet targets outlined in the National Close the Gap Agreement relating to critical issues such as child protection and youth justice, significant reform and investment will be needed. This change needs to be driven by a robust Aboriginal and Torres Strait Islander community controlled sector and sufficient powers for Aboriginal and Torres Strait Islander leaders at key oversight bodies such as the QFCC.

Enhanced focus on overrepresentation and the rights of First Nations children

QATSICPP submits that the Act should provide for an enhanced focus on First Nations children (particularly regarding Commissioner's role) to help reduce the over-representation of first nations children in the child protection system. To this end we call for changes to the Act to enable the establishment of a dedicated Aboriginal and Torres Strait Islander Family and Child Commission and Commissioner for Queensland.

Queensland's First Nations people need a dedicated Aboriginal and Torres Strait Islander Commissioner with an expanded range powers to ensure they have an independent mechanism to undertake the instruments of their various rights as outlined by the *Queensland Human Rights Act*, the Convention on the Rights of Child (CROC) and the United Nations Declaration on the Rights of Indigenous People (UNDRIP).

Rights from the *Queensland Human Rights Act* fundamental to the object of the Family and Child Commission Act include:

Section 26

Protection of families and children

(1) Families are the fundamental group unit of society and are entitled to be protected by society and the State.

(2) Every child has the right, without discrimination, to the protection that is needed by the child, and is in the child's best interests, because of being a child.

Section 28

(2) Aboriginal peoples and Torres Strait Islander peoples must not be denied the right, with other members of their community—

c)to enjoy, maintain, control, protect and develop their kinship ties;

(3) Aboriginal peoples and Torres Strait Islander peoples have the right not to be subjected to forced assimilation or destruction of their culture.

Rights from CROC fundamental to the object of the Act include:

Article 4

States Parties shall undertake all appropriate legislative, administrative, and other measures for the implementation of the rights recognized in the present Convention. With regard to economic, social and cultural rights, States Parties shall undertake such measures to the maximum extent of their available resources and, where needed, within the framework of international co-operation.

1. States Parties recognize the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development.

2. The parent(s) or others responsible for the child have the primary responsibility to secure, within their abilities and financial capacities, the conditions of living necessary for the child's development.

3. States Parties, in accordance with national conditions and within their means, shall take appropriate measures to assist parents and others responsible for the child to implement this right and shall in case of need provide material assistance and support programmes, particularly with regard to nutrition, clothing and housing.

Relevant rights from UNDRIP include:

Article 4

Indigenous peoples, in exercising their right to self-determination, have the right to autonomy or self-government in matters relating to their internal and local affairs, as well as ways and means for financing their autonomous functions

Article 18

Indigenous peoples have the right to participate in decision-making in matters which would affect their rights, through representatives chosen by themselves in accordance with their own procedures, as well as to maintain and develop their own indigenous decision-making institutions.

Article 19

States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them

Article 38
States in consultation and cooperation with indigenous peoples, shall take the appropriate measures, including legislative measures, to achieve the ends of this Declaration.[3]

At present the primary object of the Act is to "promote the safety, wellbeing and best interests of children and young people" – the absence of any reference to Queensland's state and international obligations regarding First Nation children's rights in the Act is a significant omission, especially in light of commitment enshrined in Article 38 of UNDRIP outlined above.

In addition to giving legislative effect to Australia's international human rights commitments, an independent Aboriginal and Torres Strait Islander Commissioner would contribute to addressing Aboriginal and Torres Strait Islander people's ongoing calls for increased government accountability to our communities.

Recently QATSICPP partnered with the Department of Children, Youth and Multicultural Affairs in a wide-ranging co-design process to inform the development of the *Breaking Cycles* Action Plan, the next action plan to be developed under *Our Way: A generational strategy for Aboriginal and Torres Strait Islander children and families 2017-2037*.

The Breaking Cycles co-design process engaged over 950 Aboriginal and Torres Strait Islander people of all ages in 25 communities across Queensland and culminated with a state-wide forum bringing together more than 150 people from across government, Indigenous peak bodies, non-Indigenous peak bodies and community controlled organisations, as well as Aboriginal and Torres Strait Islander peoples from communities across Queensland.

A key message from participants in this process was that to achieve the aims of the *Our Way* strategy, there needed to be far greater systemic accountability to Aboriginal and Torres Strait Islander peoples. One of the

[3] United Nations (General Assembly), 2007

suggested actions to achieve this identified in the state-wide forum was the establishment of a dedicated Aboriginal and Torres Strait Islander Family and Child Commissioner for Queensland.[4]

The creation of a dedicated Aboriginal and Torres Strait Islander Children's Commissioner, with sufficient powers (for example to have the power of enquiry examining matters relevant to First Nations children's best interests) is fundamental to ensuring service systems across a range of areas are more accountable to First Nations people.

South Australia (SA) provides a best practice example in terms of an independent body with the power to monitor and pursue relevant reforms in terms of how the jurisdiction is upholding its obligations to First Nations children.

The South Australian Commissioner for Aboriginal Children and Young People is an independent body created to promote the rights, development and wellbeing of Aboriginal children and young people within South Australia. The SA Commissioner for Aboriginal Children and Young People has absolute discretion to conduct formal inquiries into matters of particular significance to Aboriginal children and young people that are systemic in nature and in the public interest.

This includes investigation into and subsequent recommendations regarding the policies, practice and procedures of state authorities as they relate to the rights and wellbeing of Aboriginal children. Commissioner April Lawrie is soon to embark an inquiry into the application of the Aboriginal and Torres Strait Islander Child Placement Principles (ATSICPP) to the removals and placement of Aboriginal children in South Australia.

Throughout this inquiry the SA Commissioner will hear from Aboriginal children and young people, their families and communities, key stakeholders and government and non-government agencies on the legislation, policies, practices, and procedures used to apply the principles.[5]

The Aboriginal and Torres Strait Islander population in Queensland is approximately five times that of South Australia and despite First Nations children representing a large proportion of children in out-of-home care in Queensland we are yet to listen to the voices of our young people, their families and community in this way. [6]

It should also be noted that Victoria also has a Commissioner for Aboriginal Children and Young People (though this position sits within the Victorian Commission for Children and Young People) – this position also has powers to conduct formal inquiries to investigate and guide reform in the best interest of Aboriginal and Torres Strait Islander young people.

In 2014, then Commissioner for Aboriginal and Torres Strait Islander Children and Young People Andrew Jackomos released *Always was, always will be Koori children*; a report of an investigation into the circumstances of 980 Aboriginal children and young people in out-of-home care in Victoria. The report was critical in driving significant delegated authority reforms to increase self-determination and community decision making in the Victorian child protection and family support system.

On a national level, SNAICC published a *Position Paper* on the case for the establishment of a dedicated National Commissioner for Aboriginal and Torres Strait Islander children and young people that was supported by more than 80 organisations across Australia.[7]

As part of this work SNAICC commissioned international law firm King & Wood Mallesons to develop a comprehensive *Model Options Paper* that explores possible models for a National Aboriginal and Torres Strait Islander Children's Commissioner based on assessing existing national and international commissioner roles identifying best practice elements.

[4] Kinsella Consulting, 2022
[5] South Australian Commissioner for Aboriginal Children and Young People, 2022
[6] Australian Institute of Health and Welfare (AIHW), 2022; Australian Bureau of Statistics, 2022
[7] SNAICC, 2019

The review assessed existing models against the United *Nations Principles Relating to the Status of National Human Rights Institutions* (known as the "Paris Principles"). The Paris Principles include that human rights institutions should:

- Be given as broad mandate as possible
- Be focused on how jurisdictions align their laws, policies and practises with their rights commitments and obligations.
- Hear from any person and obtain any information and any documents necessary for assessing situations falling within its remit
- Freely consider any matters failing within its remit, "*whether they are submitted by the Government or taken up by it without referral to a higher authority*."

The SNAICC Model Options Paper identified key elements of an effective National Commissioner role, recommending that such a body:

- be mandated to consider the implementation of rights enshrined in the UN Convention on the Rights of the Child and the UN Declaration on the Rights of Indigenous Peoples and other relevant bodies of the international human rights system.
- develop, formalise and maintain working relationships with other domestic institutions established for the promotion and protection of the rights of Aboriginal and Torres Strait Islander children and young people.
- be mandated to publish annual and special reports, highlighting any key developments of the office and setting out the National Commissioner's opinions, recommendations and proposals with respect to matters affecting Aboriginal and Torres Strait Islander children and young people. These reports should be publicly available and tabled with parliament.[8]

This work is applicable to state jurisdictions, which manage a substantive proportion of the critical service systems that impact on the lives children and families including education, health, housing, child protection and youth justice. In Queensland the *Human Rights Act* requires public entities to act and make decisions in a way that is compatible with human rights; and whilst the Queensland Human Rights Commission is primarily tasked with oversight of this requirement, adherence could be strengthened through the more targeted oversight work of an Aboriginal and Torres Islander Children's Commissioner.

The Queensland Government's human rights commitments, as well as its commitments under the Path to Treaty process and the National Close the Gap agreement will remain unfulfilled without strong Aboriginal and Torres Strait Islander leadership to implement the change our communities need.

Close the Gap *Priority Reform Area One* commits governments to establish a joined up approach in partnership with Aboriginal and Torres Strait Islander representatives in five policy priority areas crucial for the future of our children and young people. A new Aboriginal and Torres Strait Islander Commission for Queensland would work to ensure this obligation is fulfilled.

Driving whole of government accountability to First Nations people

SNAICC's position paper on a National Aboriginal Children's Commissioner also outlined a clear need for government agencies which develop and implement unique responses and solutions to address the unique challenges faced by Aboriginal and Torres Strait Islander children and young people.

[8] SNAICC, 2020

This is particularly critical given the need to increase accountability and responsiveness from government agencies outside of the Department of Children, Youth Justice and Multicultural Affairs. The Carmody Report identified such a need:

> *"Although there is evidence of inter-agency cooperation, there is still an absence of a shared strategic direction supported by a whole-of-government structure. Overall responsibility for reforming the child protection system should rest with the collective of agencies."*[9]

The report recommended the establishment of a Child Protection Reform Leaders group with senior leaders from across different government and community agencies to achieve this shared strategic direction across government. The group continued until mid-2018 and was then disbanded. In its 2019 implementation review of the Carmody report, the QFCC noted:

> *"Concerns expressed by reform stakeholders about the siloing (isolating) of reform implementation and the absence of strategy were fuelled by their limited awareness of reform progress and outcomes from a whole-of-government perspective."*[10]

The QFCC's report also noted a fragmentation and lack of coordination across government regarding behaviour change from agencies regarding the changes to the mandatory reporting and child protection notification reforms recommended by the Carmody Inquiry. Furthermore in its *2021-2022 Annual Report* the Child Death Review Board (CDRB) identified "*departmental and portfolio silos that are impacting on the ability to delivery holistic family support and early intervention*."[11]

The above highlights that the impetus for a whole of government approach to critical issues for families, children and young people has lost momentum since the Carmody Inquiry and queries the effectiveness of approaches to cross agency coordination that are driven solely within government.

There should be consideration of how service delivery contracted out by government can be more accountable to First Nations people. Professor Peter Coldrake's review of the Queensland public service noted an emerging pattern across public sector agencies to outsource areas of government service delivery which have traditionally been within Ombudsman oversight, concluding that these changes put at risk the level of oversight available to such services.[12]

In order for a Commissioner position to be able to hold both government and non-government agencies that impact on First Nations children and families to account, an expanded range of powers are needed for the role. SNAICC's Position Paper called for the First Nations Children's Commissioner position to be granted appropriate powers to enable it to lead critical reforms, noting:

> *"Given the significant and widespread issues experienced by many Aboriginal and Torres Strait Islander children and young people, it is important that the national commissioner be granted appropriate functions and powers to promote systemic oversight and accountability."* [13]

QATSICPP is proposing that the Act be amended to establish a new Aboriginal and Torres Strait Islander Children's Commission for Queensland with powers to hold public inquiries similar to that of the role in South Australia. Such inquiries provide a significant platform from which the Commissioner position could drive whole of government accountability and reform.

[9] QCPCI, 2013, p.xxiv
[10] QFCC, 2019
[11] CDRB, 2022, p.8
[12] Coldrake, 2022
[13] SNAICC, 2019, p.7

Effective communication and/or coordination between the QFCC and other Government entities

The Independent review of the QFCC conducted by ACIL Allen recommended consideration of enhanced information sharing between the QFCC and the Office of Public Guardian regarding evidence of issues for individual children and young people that can be used for systemic analysis and reform.

QATSICPP strongly supports strengthening the Act and associated legislation to direct agencies with individual advocacy functions, such as the Office of Public Guardian and those with systemic oversight functions (such as the QFCC) to collaborate more closely.

Thousands of Aboriginal and Torres Strait Islander children in both out-of-home care and in detention across Queensland are visited by the Office of Public Guardian's Community Visitors each year. Through their work providing individual advocacy Community Visitors collect a huge amount of significant information about children's experiences of these systems. The ACIL Allen Independent Review of the QFCC reported that:

> ***"The Public Guardian noted they regularly communicate issues they observe, particularly with trends that suggest there are systemic issues within the child protection system. However, they were not able to confirm if this has had an impact in guiding the QFCC's work."***[14]

QATSICPP is not aware of any regular publication schedule where the Office of Public Guardian reports in any more than a brief way regarding the systemic issues Community Visitors encounter in their work. The Office of Public Guardian (OPG) Annual Reports contain very little detailed information about the issues raised by children and young people in youth justice and child protection.

Other than in high profile media stories about children in adult watch houses reported on in 2019, the OPG rarely publishes any kind of systemic analysis of issues for children and young people in its remit, and QATSICPP is not aware of any situations where the OPG has supplied data to the QFCC for the purposes of systemic analysis.

As such there is currently a huge amount of data about children and young people's views experiences which remains unused by the QFCC in its efforts achieve the objects of the Act, namely to improve the child protection system and promote the safety, wellbeing and best interests of children and young people. This seems a missed opportunity for the QFCC, particularly given the Act states in Section 23 (1) (a) that a key role for the Commissioners is to "*engage with, and take account of, the views of children, young people and their families*."[15]

Given that the QFCC and OPG have not collaborated to utilise important data featuring the voices of children and young people in the period since the introduction of the Act, QATSCIPP calls for the Act and any other legislation to include stronger direction for the OPG to share data with the QFCC to help enhance decision making and systemic oversight.

Whether the QFCC should have a legislated workforce planning and development function

It is QATSICPP's belief that the workforce planning, and development function outlined in the Act are not best placed with the QFCC, resulting in duplication and inefficiencies.

As noted by the ACIL *Allen Independent Review of the QFCC*, the QFCC has decreased its activities in this area because it has been unable to significantly influence implementation and operation and other organisations are better placed to do so.

QATSICPP supports this analysis; there is already considerable workforce development reform being undertaken by QATSICPP, along with other sector bodies in partnership with the Queensland Government.

[14] ACIL Allen, 2022, p.18
[15] Family and Child Commission Act 2014 (Qld)

Given this, the QFCC's resources are better reallocated to other areas highlighted in this submission, such as whole of government approaches to the over-representation of children and young people in out-of-home care.

Changes required to better support the current role of the Child Death Review Board (CDRB)

The consultation paper accompanying the review of the Act seeks feedback on whether any changes are required to better support the current role of the CDRB.

QATSICPP acknowledges that the Act currently stipulates the chair or deputy chair role of the CDRB must be an Aboriginal and Torres Strait Islander person. Noting that 51 percent of the children whose deaths were reviewed by the Board in 2021-2022 were Aboriginal and/or Torres Strait Islander, we would like to see a commitment that increases the representation of First Nations people on the CDRB.

This commitment to increase greater representation by Aboriginal and Torres Strait Islander peoples on a significant oversight mechanism such as the CDRB would enable greater self-determination and accountability for First Nations people in systemic decision making about the lives of our children and families.

Our Recommendations

To strengthen accountability and oversight for Aboriginal and Torres Strait Islander children and young people, QATSICPP recommends the Queensland Government amend the Act as follows:

1. To establish a new Aboriginal and Torres Strait Islander Children's Commission for Queensland with powers to hold public inquiries similar to that of the role in South Australia.

2. Failing the establishment of a dedicated Aboriginal and Torres Strait Islander Children's Commissioner, at the very least the Act should be amended to establish a new structure and powers of the QFCC Commissioners whereby there are two Principal Commissioners, one of whom must be an Aboriginal person or a Torres Strait Islander. This change would grant sufficient recognition and authority (including cultural authority) to enable the QFCC to direct more of its resourcing to;

    - advancing the aims of the *Our Way* strategy, which seeks eliminate overrepresentation of Aboriginal and Torres Strait Islander children in care by 2032

    - working in partnership with Aboriginal and Torres Strait Islander communities to increase the accountability of politicians and government agencies to First Nations peoples

    - enable a process whereby the QFCC's structure and operations are to be to be reformed through a co-design with First Nations people, making it a more relevant, engaged and culturally safe organisation for our people across Queensland

    Furthermore the Act should be amended to give both Principal Commissioners legislative powers and functions to hold formal inquiries into matters relevant to Aboriginal and Torres Strait Islander children and families as outlined earlier in our submission.

3. Strengthening the Act and associated legislation to more clearly direct the OPG to collaborate more closely with the QFCC on data sharing to enhance systemic oversight.

4. Remove from the Act Section 9 (1) (c) – the function of the QFCC to "*develop and review workforce planning and development strategies for the child protection system*"[16] given this work is more effectively undertaken by other bodies in the child and family sector, such as peak bodies.

5. A commitment from the Queensland Government to increasing Aboriginal and Torres Strait Islander representation on the CDRB and to annually review the membership to enhance self-determination and accountability for First Nations people in systemic decision making about the lives of our children and families.

Contact details

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[16] Family and Child Commission Act, 2014 (Qld)

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